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COLORADO DEPARTMENT OF HEALTH

Dedicated to protecting and improving the health and environment of the people of Colorado

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Roy Romer Governor Patricia A. N Executive D

December 18, 1992

Mr. Richard J. Schassburger U. S. Department of Energy Rocky Flats Office, Bldg 116 P.O. Box 928 Golden, Colorado 80402-0928

RE: Waste Stored on IHSSs in OU 10

Dear Mr. Schassburger,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), is aware that various hazardous and solid wastes are being stored in several IHSSs scheduled for investigation and closure as a part of OU 10. These wastes have not been characterized and, therefore, need to be managed accordingly. We previously called this fact to the attention of DOE in our comments to the Final OU 10 Phase I RFI/RI Workplan (Gary Baughman to Frazer Lockhart, 6/2/92). The Workplan, which is now approved, contains a schedule indicating that RFI/RI field work in OU 10 will occur between July 27, 1992 and December 1, 1993. The Division has not received any indication from DOE that the Workplan cannot be implemented within that time-frame. until the wastes are removed from the affected IHSSs, the planned Delays to IAG milestones investigations cannot be completed. DOE's be units will by waste remaining in the caused responsibility.

The Division has received a permit modification request from DOE regarding the continued use of two OU 10 units which currently contain waste, namely IHSS 213 (Unit 15, 904 Pad) and IHSS 214 (Unit 25, 750 Pad). In order for the RFI/RI Workplan for OU 10 to be amended and the newly permitted units removed from the investigation, appropriate closure plans must be submitted with the permit modification. These closure plans should include all of the investigatory and analytical requirements currently included in the RFI/RI Workplan, the requirements of the existing Hazardous Waste Permit, and the requirements proposed in the permit modification. At a minimum, this would require a more comprehensive analysis for radionuclides than is presently proposed.

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If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 692-3356.

Sincerely,

Gary W. Baughman, Chief

Facilities Section

Hazardous Waste Control Program

CC: Martin Hestmark, EPA
Tom Lukow, DOE
Bruce Thatcher, DOE
Mike Arndt, EG&G
Jackie Berardini, CDH-OE